

**UNITY: Journalists of Color, Inc.**  
1601 N. Kent Street, Suite 1003, Arlington, VA 22209 (703) 469-2100

Ex Parte Or Late Filed

UNITY: Journalists of Color, Inc.  
1601 Kent Street, Suite 1003  
Arlington, VA 22209

May 27, 2003

Honorable Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20054

Dear Ms. Dortch:

RE: MB Docket No. 02-277 (Review of the Commission's Broadcast Ownership Rules)

MM Docket No. 01-235 (Cross-Ownership of Broadcast Stations and Newspapers)

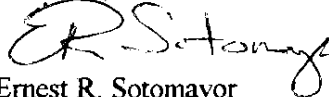
MM Docket No. 01-317 (Radio Broadcast Stations in Local Markets)

MM Docket No. 0-244 (Definition of Radio Markets)

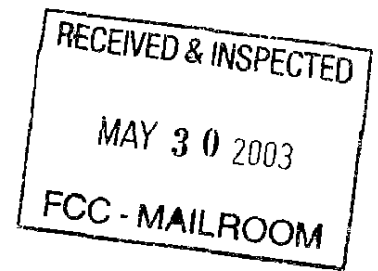
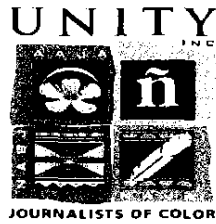
The national organization UNITY: Journalists of Color, Inc., is asking the FCC to amend is process in the above mentioned matters regarding the Broadcast Ownership Rules and the related issues. Attached is a letter we wish to submit to the Commission and its chairman, Michael K. Powell and to the entire Commission. Copies are attached.

Thank you.

Sincerely,

  
Ernest R. Sotomayor  
President, UNITY: Journalists of Color, Inc.

No. of Copies rec'd \_\_\_\_\_  
List ABOVE



**UNITY: Journalists of Color, Inc.**

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May 27, 2003

Michael Powell, Chairman  
The Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*In the Matter of 2002 Biennial Regulatory Review - Review of the Commission's  
Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the  
Telecommunications Act of 1996 -- MB Docket No. 02-277*

Mr. Chairman:

I write again on behalf of UNITY: Journalists of Color, Inc., a coalition representing the four largest journalism organizations of color in the United States, with a collective membership of more than 7,000.

Next Monday, June 2, 2003, you intend to convene an open session of the Federal Communications Commission, and vote to implement rule changes as part of the biennial review of the media ownership rules. You have stated that it is your intention to move forward with this process without delay, based on the mandate by Congress for such a review, and by the prospect of intervention by the courts should you delay in justifying existing regulations. But you also acknowledge you have the discretion for a delay.

The current review of the regulations is among the most extensive ever undertaken at one time by the FCC, and yet the repeated surveys show that the public – to whom you are most responsible in your work, by law – has not had the benefit of sufficient educational campaign by your agency regarding these changes, and worse, by the media itself. The major television networks have been all but devoid of coverage about the rules review, and few other news organizations have provided any detailed explanation.

Months ago, there were calls by our organization, as well as others representing thousands of journalists of color, for a wide range of public hearings to not only gather

public input, but more importantly to disseminate the crucial explanations about the media ownership rules review.

To date, Mr. Chairman, you have dismissed the impassioned pleas for any delays to garner more input, and you have dismissed the need for the FCC itself to educate the public through public hearings nationwide.

Such refusal fails the public good, and UNTY again joins a growing chorus that calls upon you to slow this process and fulfill your obligation to allow for and seek out reasonable, informed input. Further, we strongly urge that if the Commission proceeds with a vote on June 2 to implement news ownership rules, that the changes be made conditional, and a window be opened for additional public comment on the proposals.

The public's interest is paramount since it has the most at stake in any future changes within the news media, and it is our position that convening a single public hearing for public participation does not adequately serve the public good.

Furthermore, last week, you announced that you intend to form a "Federal Advisory Committee" through which the FCC will seek input "to assist the agency in formulating new ways to create opportunities for minorities and women in the communications sector."

According to the FCC statement, "The Diversity Committee will tap the expertise of high-level players in the communications sector as well as the financial and technology communities. The Diversity Committee will develop a set of recommendations including potential regulatory actions and education initiatives to promote and enhance opportunities for minorities and women."

Mr. Chairman, while we believe such input is not only crucial but legally warranted as well, we question why you would not seek such input prior to implementing the new media ownership rules. Such action signals a disregard for the importance of diversity in ownership and of opinion, two principles that are central to our argument.

As UNITY stated in a March 24, 2003 letter to you:

*"Our concerns follow an erosion of representation of people of color in major parts of the broadcast media industry. According to the 2002 annual survey by the Radio and Television News Directors Association, the representation of people of color in local broadcast newsrooms declined from 24.6 in 2001 to 20.6 in 2002. We remain concerned about the diversity at the national level, as well, but similar data is not available for the networks, since they do not participate in the RTNDA annual census. It is widely acknowledged, however, that the networks have made little progress on this front, and no measures under FCC rules now address this lack of diversity."*

The same holds true in the newspaper industry. The 2003 annual newsroom census released one month ago showed once again that America's newspapers today are no

closer to reaching the goal of racial and ethnic parity with the nation's communities than they were when the industry established its goal more than a century ago.

Yet, it is apparent that we are likely to see relaxed regulations that will allow even more and bigger consolidations between companies that already are failing in their moral duty and professional mandate to provide fair and accurate journalism through diversity in their workforces.

We urge the Commission to make diversity in ownership and the workforce, and, most importantly in coverage, a priority, by establishing mechanisms for monitoring these issues in the face of certain additional consolidation, in ways that will push media companies to adhere to their promises of providing fair, representative, quality coverage.

UNITY, along with its alliance partners – Asian American Journalists Association, National Association of Black Journalists, National Association of Hispanic Journalists and Native American Journalists Association – stand committed to working with the Commission and other agencies and institutions to correct the deficiencies in diversity in journalism, particularly in broadcast media. We urge you to call on our organizations to seek our input, and utilize our decades of expertise, in moving this agenda forward.

Finally, we urge you to listen to the vast sea of support for delaying, a call that comes from scores of lawmakers – Democrats and Republicans – children's programming experts, high-ranking broadcasting executives, scholars, public advocates, professional journalism organizations, and ultimately, from tens of thousands of individuals.

Sincerely,



Ernest R. Sotomayor, President  
UNITY: Journalists of Color, Inc.  
[esotomayor@newsday.com](mailto:esotomayor@newsday.com)

cc: Commissioners Kathleen Q. Abernathy; Michael J. Copps; Kevin J. Martin; Jonathan S. Adelstein

*UNITY: Journalists of Color, Inc. is a strategic alliance committed to ensuring fair and accurate news coverage of communities of color. UNITY represents more than 7,000 members of the National Association of Black Journalists (NABJ), the National Association of Hispanic Journalists (NAHJ), the Asian American Journalists Association (AAJA) and the Native American Journalists Association (NAJA). Member organizations jointly gather every five years in what have been, in 1994 and 1999, the largest journalism conventions in U.S. history. The next UNITY convention, "A Powerful Alliance – A Force For Change – will be held August 4-8, 2004 in Washington D.C*